

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

**IN RE SOVOS COMPLIANCE DATA
SECURITY INCIDENT LITIGATION**

Case No. 1:23-CV-12100 (“Master Docket”)

CLASS ACTION

**PLAINTIFFS’ UNOPPOSED MOTION FOR FINAL APPROVAL
OF CLASS ACTION SETTLEMENT AND APPLICATION
FOR ATTORNEYS’ FEES, COSTS, AND SERVICE AWARDS**

Plaintiffs, Sergei Stadnik, Julianne Yenca, James Lawler, and Tony Anderson, on behalf of themselves and the proposed Settlement Class,¹ with the consent of Defendant, Sovos Compliance, LLC, hereby move this Court for Final Approval of the class action Settlement preliminarily approved by this Court on February 12, 2024 (D.E. 42). Plaintiffs respectfully request this Court enter a Final Approval Order and thereafter a Final Judgment:

- a. Granting final certification of the Settlement Class, appointing Plaintiffs Sergei Stadnik, Julianne Yenca, James Lawler, and Tony Anderson as settlement Class Representatives, and appointing as settlement Class Counsel Mason Barney and Tyler Bean of Siri & Glimstad LLP and Jeff Ostrow of Kopelowitz Ostrow P.A.
- b. Finding the Notice satisfied due process requirements and Federal Rule of Civil Procedure 23;
- c. Finding the terms of the Settlement are fair, reasonable, and adequate, are within the range of possible approval; the Settlement was entered into after extensive, arm’s-length negotiations; and the Settlement terms are approved, adopted, and incorporated by the Court;
- d. Directing the Parties, their attorneys, and the Settlement Administrator to consummate the

¹ All capitalized terms herein shall have the same meaning as those defined in Section II of the Settlement Agreement and Releases, which is attached to the Memorandum of Law in support of this Motion as *Exhibit A*.

Settlement in accordance with the Final Approval Order and the terms of the Agreement;

- e. Resolving all claims, including the Released Claims, against the Released Parties and ruling the Settlement is binding on all Settlement Class Members, including the Releases contained in the Agreement;
- f. Overruling any objection, including the lone objection submitted to date that does not meet the requirements of the Preliminary Approval Order or the Agreement; and
- g. Approving Class Counsel's Application for Attorneys' Fees, Costs, and Service Awards.

In support of this Motion, Plaintiffs submit their Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement and Application for Attorneys' Fees, Costs, and Service Awards, the Declaration of settlement Class Counsel Jeff Ostrow and Mason Barney, the Declaration of Scott M. Fenwick of Kroll Settlement Administration LLC, all other pleadings and papers on file in this Action, and any oral argument that may be heard by this Court at or prior to the Final Approval Hearing currently scheduled for July 23, 2024.

Dated: June 7, 2024.

Respectfully submitted,

/s/ Jeff Ostrow

Jeffrey Ostrow (*pro hac vice*)

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Counsel for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on this the 7th day of June, 2024, a copy of the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system.

/s/ Jeff Ostrow